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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA

v.

JIMMIE BOWENS,  
a/k/a "Boonka," and  
WALTER KIRKLAND

: Honorable James B. Clark, III  
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Mag. No. 23-12075

**CRIMINAL COMPLAINT**

I, Special Deputy Frank De Los Santos, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Deputy with the United States Marshals Service and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

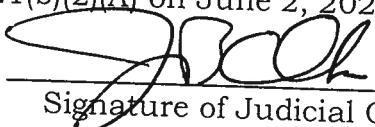
Continued on the attached page and made a part hereof:

s/Frank De Los Santos

Frank De Los Santos, Special Deputy  
United States Marshals Service

Special Deputy De Los Santos attested to this Complaint by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A) on June 2, 2023.

HONORABLE JAMES B. CLARK, III  
UNITED STATES MAGISTRATE JUDGE

  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

(Conspiracy to Distribute Controlled Substances)

From at least in or around December 2022 through on or about June 1, 2023, in Hudson County, in the District of New Jersey and elsewhere, the defendants,

**JIMMIE BOWENS,  
a/k/a "Boonka," and  
WALTER KIRKLAND,**

did knowingly and intentionally conspire with each other and others to distribute and possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

In violation of Title 21, United States Code, Section 846.

**COUNT TWO**

(Possession of Firearms and Ammunition by a Convicted Felon)

On or about June 1, 2023, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

**JIMMIE BOWENS,  
a/k/a "Boonka,"**

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year in the Superior Court of New Jersey, Hudson County, did knowingly possess in and affecting commerce firearms and ammunition, namely, a Ruger Max-9 9mm handgun, bearing serial number 350046066 and loaded with one round of ammunition in the chamber, a Taurus G2A 9mm handgun, bearing serial number TMB31081 and loaded with 6 rounds of ammunition, approximately 36 rounds of Remington hollow point ammunition, and approximately 29 rounds of Remington .22 caliber ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**ATTACHMENT B**

I, Frank De Los Santos, am a Special Deputy with the United States Marshals Service ("USMS"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. Since in or around January 2022, law enforcement has been investigating members and associates of a neighborhood-based street gang known as "Parkside," which operates on and around Martin Luther King Drive between Armstrong Avenue and Warner Avenue in Jersey City, New Jersey (the "Parkside Enterprise").
2. To date, the investigation has included lawfully recorded communications, electronic and physical surveillance, analysis of call detail records, lawful searches, narcotics seizures, firearms seizures, and the utilization of confidential sources, among other investigative techniques. During the course of the investigation, law enforcement has determined that Jimmie Bowens, a/k/a "Boonka" ("BOWENS"), is a high-ranking member of the Parkside Enterprise.
3. The investigation has revealed that members of the Parkside Enterprise, including BOWENS and Walter Kirkland ("KIRKLAND"), have been and continue to distribute controlled substances in and around the area controlled by the Parkside Enterprise. Throughout the course of the investigation, law enforcement has observed, using both fixed and mobile surveillance, BOWENS, KIRKLAND, and other members and associates of the Parkside Enterprise engage in hand-to-hand transactions consistent with narcotics sales in these locations.
4. On or about June 1, 2023, law enforcement executed search warrants at several locations utilized by BOWENS, KIRKLAND, and other members of the Parkside Enterprise. At one residence located on Lembeck Avenue—a residence associated with BOWEN (the "Lembeck Residence") law enforcement encountered BOWENS as he exited the Lembeck Residence and approached a vehicle. In the basement of the Lembeck Residence, law enforcement recovered a Ruger Max-9 9mm handgun, bearing serial number 350046066, which was loaded with one round of ammunition in the chamber ("Firearm-1") and approximately \$8,339 in U.S. currency. Firearm-1 was located inside the pocket of a black North Face jacket which law enforcement has observed BOWENS wearing during the investigation.

5. At a second search warrant location, specifically a residence on Cator Avenue—another residence associated with BOWENS—law enforcement recovered the following located in a bedroom utilized by BOWENS: (1) a duffle bag which held approximately 11,643 glassine envelopes stamped with “Takeoff,” “Deebo,” “Winter Soldier,” “Snowfall,” “King Diesel,” “Dirty Diana,” “The Punisher,” “Sudden Impact,” “Sweet Dreams,” “Full Effect,” “Deathrow,” “Quality Control,” and “E” containing suspected heroin and a Taurus G2A 9mm handgun, bearing serial number TMB31081, loaded with six rounds of ammunition (“Firearm-2”); (2) approximately 50 glass vials containing suspected cocaine; (3) approximately 36 rounds of Remington hollow point ammunition and approximately 29 rounds of Remington .22 caliber ammunition (the “Ammunition”); (4) approximately \$53,542 in U.S. currency; and (5) various items of paraphernalia, including a digital scale and a money counting machine. At a third search warrant location, specifically a residence on Woodlawn Avenue, also associated with BOWENS, law enforcement recovered additional narcotics packaging items, including a Ziplock bag containing money bands and several plastic bags containing empty capsules used for packaging cocaine. Law enforcement also recovered several items bearing BOWENS’s name.

6. At a fourth search warrant location, specifically a residence on Martin Luther King Boulevard, law enforcement encountered KIRKLAND. At that location, law enforcement recovered approximately 992 glassine envelopes stamped with “4,” “Deebo,” and “Takeoff” containing suspected heroin, approximately 77 glass vials containing suspected cocaine, approximately \$3,052 in U.S. currency, and approximately 18 empty glass vials used for packaging cocaine.

7. Firearm-1, Firearm-2, and the Ammunition were all manufactured outside the State of the New Jersey and thus necessarily traveled in interstate commerce prior to on or about June 1, 2023.

8. As of on or about June 1, 2023, BOWENS had at least one prior felony conviction in the Superior Court of New Jersey, Hudson County, including a conviction on or about May 4, 2017, for possession of a controlled dangerous substance, in violation of N.J.S.A. 2C:35-10A(1), which is an offense punishable by a term of imprisonment exceeding one year and for which BOWENS was sentenced to a term of imprisonment of five years in state prison.